

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHTPLUS VENTURES LLC,

Plaintiff,

Civil Action No.: 2:22-cv-194-JRG-RSP

v.

Jury Trial Demanded

TCL ELECTRONICS HOLDINGS LTD.
(F/K/A TCL MULTIMEDIA TECHNOLOGY
HOLDINGS, LTD.); TCL INDUSTRIES
HOLDINGS CO., LTD.; TCL INDUSTRIES
HOLDINGS (H.K.) LIMITED; TTE
CORPORATION; TCL MOKA
INTERNATIONAL LIMITED; TCL MOKA
MANUFACTURING S.A. DE C.V.; TCL
KING ELECTRICAL APPLIANCES
(HUIZHOU) CO. LTD.; MANUFACTURAS
AVANZADAS S.A. DE C.V.; TCL SMART
DEVICE (VIETNAM) CO., LTD.;
SHENZHEN TCL NEW TECHNOLOGY
CO., LTD.; TCL OPTOELECTRONICS
TECHNOLOGY (HUIZHOU) CO., LTD.;
TCL OVERSEAS MARKETING LTD.; AND
TCL TECHNOLOGY GROUP
CORPORATION (F/K/A TCL CORP.),

Defendants.

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff Brightplus Ventures LLC and Defendants TCL Electronics Holdings Ltd. (f/k/a
TCL Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL
Industries Holdings (H.K.) Limited; TTE Corporation; TCL Moka International Limited; TCL
Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.;
Manufacturas Avanzadas S.A. de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL
New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL

Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.)

(collectively, “Parties”), jointly file this motion for entry of an agreed Protective Order.

The parties have met and conferred and agree on all provisions of the proposed Protective Order for this case. Accordingly, the parties respectfully request that the Court enter the attached order.

Dated: December 7, 2022

Respectfully submitted,

By: /s/ Andrey Belenky

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Respectfully submitted,

By: /s/ Joshua R. Thane

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Multimedia Technology Holdings, Ltd.); TCL Industries Holdings Co., Ltd.; TCL Industries Holdings (H.K.) Limited; TTE Corporation; TCL Moka International Limited; TCL Moka Manufacturing S.A. de C.V.; TCL King Electrical Appliances (Huizhou) Co. Ltd.; Manufacturas Avanzadas S.A. de C.V.; TCL Smart Device (Vietnam) Co., Ltd.; Shenzhen TCL New Technology Co., Ltd.; TCL Optoelectronics Technology (Huizhou) Co., Ltd.; TCL Overseas Marketing Ltd.; and TCL Technology Group Corporation (f/k/a TCL Corp.)

CERTIFICATE OF CONFERENCE

I hereby certify that counsel have meet and conferred as required by Local Rule CV-7(h) and that this motion is agreed to jointly by parties and unopposed.

/s/ Andrey Belenky

Andrey Belenky

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on December 7, 2022.

/s/ Andrey Belenky

Andrey Belenky